

ANNUAL NOTICE PROTOCOL/STUDENT RECORD POLICY

CVHCS

**CHAP SER/CPE 208
April 2020**

SUBJECT: Student educational records policy

PURPOSE:

To assure that the CPE program maintains student records in compliance with ACPE Standards (See <https://www.manula.com/manuals/acpe/acpe-manuals/2016/en/topic/guide-for-student-records>) and in a manner which addresses confidentiality, access, content, and custody of student records that complies with the Family Education Rights and Privacy Act (FERPA).

POLICY:

CVHCS guarantees to its students the rights to inspect and review education records, to seek to amend them, to specified control over release of record information, and to file a complaint against the program for alleged violations of these Family Education and Privacy Act (FERPA) rights. CVHCS shall maintain records in a manner consistent with the Guidelines for Student Records as appears in Appendix 7B, *ACPE Accreditation Manual*. This ANNUAL NOTICE PROTOCOL/STUDENT RECORD POLICY is posted on the CVHCS CPE website:

http://www.richmond.va.gov/Clinical_Pastoral_Education.asp.

PROCEDURES:

I. Directory Information

Directory information is student information not generally considered harmful or an invasion of privacy if released. It includes the student's name, address, email, telephone number, date of birth, religious preference and/or denomination and may include a photo. Current students can restrict or opt out of the release of directory information and/or record access at any time during attendance by giving a written and signed memo to the ACPE Educator. Students are informed of their right to restrict or opt out of the release of directory information and/or record access by receiving the following in their acceptance letter: "You may choose to restrict or opt out of release of directory information and/or record by giving a written and signed memo to me. For more information on how to do this, go to https://www.richmond.va.gov/Clinical_Pastoral_Education.asp and read the student record policy." Restrictions will be honored even after the student's departure; however, former students cannot initiate new restrictions after departure. The student's name, address, denomination and unit of CPE successfully completed will be sent to the ACPE office on the ACPE Student Unit Report at the completion of each unit of CPE. All other information is released only with the student's written, signed, dated consent specifying which records are being disclosed, to whom, and for what limited purpose.

II. Student Record

An ACPE student record at CVHCS is any record (paper, electronic, video, audio, biometric, etc.) directly related to the student from which the student's identity can be recognized. At the end of the unit, the student record is thinned to hold only the face sheet, the signed Use of Clinical Materials Consent Form, the student self-evaluation, and the Educator's evaluation. A copy of the ACPE Educator's final evaluation will be given to the student.

III. Records Management

The student record will be kept in a locked cabinet in the CVHCS Chaplain Service Office for ten years after the end of the unit. At the ten-year mark, the evaluations will be destroyed and only the face sheet with identification information and the signed Use of Clinical Materials Consent Form will be kept. This means that after ten years, students are responsible for maintaining their own files for future use. These records shall not be open to anyone outside the ACPE center except with the student's written request unless the release of information would protect the health or safety of the student or others and for accreditation or complaint review or as required for legal processes. Before releasing material in any of these circumstances, the ACPE Educator will consult with the ACPE Executive Director or Program Manager. If the CVHCS ACPE program closes or loses its accreditation, the center Educator or appointed designee will secure all student records and ship the records to the national office of ACPE, c/o Accreditation.

The Chief of Chaplain Service is responsible to secure student records in the absence of an ACPE Educator. Only the Chief of Chaplain Service is authorized to retrieve student records with a student's written request and written authorization.

Students will be able to review their record within 45 days of their request. Record inspection cannot be denied based on the student's inability to come to our Center or outstanding financial obligations. In the latter case, we will note on the copy sent, "not available for official use."

A student has the right to object to record content. If not negotiable, the written objection will be kept with and released with the record. Grades are exempted from this right. In other words, the Educator's statement in his/her final evaluation that includes a statement attesting to the competence demonstrated at the time of the evaluation is exempted from this right.

Health records (mental and physical) will be kept in locked, limited access files separate from other student records. Their use and release is also subject to ADA and HIPPA regulations. Certain safety and employment records are also subject to other federal regulations and state laws and are kept separately.

Material written by students, such as verbatim and case histories that contain information about other persons, including other students, will either be destroyed or, if

they are part of the student's record, will have the identifiable information about everyone other than the student redacted.

Supervisory notes are process notes kept by the ACPE Educator. These process notes are for the exclusive use of the Educator and are not considered a part of the student's record. They are kept separately from the student record.

IV. ACCESS TO STUDENT RECORD

All CPE Student Records will be kept in a locked file cabinet at CVHCS. Only education officials have access to the student records based on their role in the center. The education officials are the Educator of the CPE program, other CPE Educators (including Certified Educator Candidates) at CVHCS, and the CVHCS Chaplain Service Secretary.

Information in student records or in the ACPE Educator's records may be considered of research value based on legitimate educational interest for selection, assessment, and evaluation of students. In this case, if another ACPE Educator wishes to access the student file, he/she must obtain a release form signed and dated by the student. No personally identifiable material will be used for research without the student's written permission for its use.

V. VIOLATIONS

Violations of these protocols will be reported to the Chair of the Accreditation Commission at the following address: 55 Ivan Allen Jr. Boulevard, Suite 835, Atlanta, GA 30308 (404) 320-1472.